

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



December 19, 2014

Latrisha Jemison, Board Chair
Urban League of Middle Tennessee
50 Vantage Way, Suite 201
Nashville, TN 37228

Dear Ms. Jemison:

Please find attached the Monitoring Report of the Urban League of Middle Tennessee relating to the contract with the Metropolitan Government of Nashville and Davidson County for the fiscal year ending June 30, 2014.

The Office of Financial Accountability is charged with the responsibility of monitoring grant funds, including Community Enhancement Funds, from Metropolitan Nashville Government to any nonprofit organization. Staff from the Office of Financial Accountability conducted the review on September 12, 2014.

We appreciate the assistance provided by your agency during the course of the review. If you have any questions, please call me at 615-862-6712.

Sincerely,

Kevin Brown

Kevin Brown

cc: Patricia Stokes, President and CEO
Richard M. Riebeling, Director of Finance
Talia Lomax-O'dneal, Deputy Director of Finance
Gene Nolan, Deputy Director of Finance

Kim McDoniel, Chief of Accounts
Mark Swann, Internal Audit
Fred Adom, CPA, Director Office of Financial Accountability
Essie Robertson, Office of Financial Accountability



Metropolitan Government of Nashville and Davidson County

Urban League of Middle Tennessee

◆ Monitoring Report ◆

Conducted by



Office of Financial Accountability

December 19, 2014

MONITORING REPORT

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INTRODUCTION

The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of the Urban League of Middle Tennessee. A monitoring review is substantially less in scope than an audit. The OFA did not audit the financial statements and, accordingly, does not express an opinion or any assurances regarding the financial statements of the Urban League of Middle Tennessee or any of its component units. The OFA is responsible for the internal monitoring of Metropolitan Government of Nashville and Davidson County (hereinafter referred to as “Metro”) agencies that receive federal and state financial assistance, including cooperative agreements and non-profit organizations that receive appropriations and Community Enhancement Funds from Metro government. In summary, any agreement(s) that imposes performance and/or financial requirements on Metro government is subject to review by the OFA.

The purpose of this review was to assess the agency’s compliance with contractual requirements set forth in the following contract with Metro Government:

| Contract | Type | Amount | Contact Term | |
|-----------------|-----------------------------|---------------|---------------------|---------------|
| L-3058 | Community Enhancement Funds | \$36,100 | July 1, 2013 | June 30, 2014 |

Agency Background

Established in 1968, the Urban League of Middle Tennessee’s mission is to enable African Americans and other disenfranchised groups to secure economic self-reliance, parity, power and civil rights. The Urban League of Middle TN focus includes the following:

- Economic empowerment which includes workforce development, jobs, housing, and entrepreneurship.
- Youth & Education services focused on ensuring academic competence while preparing young people for life, leadership and success.
- Health & Quality of life for all.
- Civic Engagement and empowering communities through participation in the political process.

OBJECTIVES, SCOPE AND METHODOLOGY

The objectives of our review were:

- 1) To determine whether the agency had the resources and capacity to administer the grant funds.
- 2) To determine if costs and services were allowable and eligible.
- 3) To verify that program objectives were met.
- 4) To test the reliability of the financial and programmatic reporting.
- 5) To verify contractual compliance.

The scope of our review was limited to the contract term July 1, 2013 through June 30, 2014.

Audit procedures included meeting with agency management and staff, reviewing the design of internal controls as a basis for establishing our testwork, reviewing board minutes and obtaining written representations from management. In addition, we examined certain financial records and supporting documentation necessary to ensure compliance with contractual requirements set forth in contract L-3058. Specific procedures included:

- Interviewing the employees responsible for grant management, financial reporting and accountability.
- Reviewing supporting documentation of expenditures for allowability, necessity and reasonableness.
- Reviewing the agency's general ledger and verifying the accuracy of all invoices submitted to Metro.
- Reviewing documentation to determine that funds were used for intended beneficiaries and expended in accordance with the spending plan of the contract.
- Reviewing documentation to support program activities for consistency with grant requirements.
- Assessing the financial stability of the agency and its ability to continue to administer the grant program funded by Metro.

RESULTS OF REVIEW

SUMMARY OF RESULTS

| Criteria | Yes | No |
|--|-----|----|
| Sufficient Resources and Capacity to Administer Funds? | ✓ | |
| Costs and Services Allowable and Eligible? | ✓ | |
| Program Objectives Met? | | ✓ |
| Reporting Requirements Met? | ✓ | |
| Sufficient Internal Control Environment? | ✓ | |
| Compliance with Civil Rights Requirements? | ✓ | |

RESULTS OF REVIEW

The overall results of the monitoring review are provided in this section. Results are based on testwork performed and include conclusions regarding specific review objectives and, if applicable, recommendations for improvement and an action plan for implementation. Where applicable, the Findings and Recommendations section of this report provides more insight into any issues identified below.

1. Sufficient Resources and Capacity to Administer Grant Funds

Our review of the agency's accounting system and the qualifications of the individuals assigned to manage the accounting records indicate that the agency possesses the necessary resources and professional expertise to effectively administer the grant funds.

2. Allowable and Eligible Costs and Services

Our review covered all of the core compliance areas identified by OMB Circular A- 133: *Audit of States, Local Government, and Non-Profit Organizations*. Costs incurred by the agency complied with applicable guidelines stated in OMB Circular A-122.

Additionally, the Metro Grants Manual requires separate accounting of the Metropolitan Nashville Government grant funds to prevent co-mingling of Metro Funds with other sources of funding. The agency was in compliance with this requirement. Different revenue classes as well as expenditure classes have been established to separately track the sources and amounts of funding. Also, the agency can easily and accurately report their expenses supported by the Metro grant.

Based on our test work, costs and services during the period were allowable and eligible.

3. Program and Performance Objectives

The contract stipulates that the agency shall use the funds to serve a minimum of 40 youth (20 per site) and provide ELD (English Language Development) sessions for parents, serving up to 20 adult family members with the following outcomes:

RESULTS OF REVIEW

- Demonstrated increase in reading proficiency levels among 50% of participating students in the 1-8th grades as measured by pre/interim and post assessments.
- Demonstrated improvements in overall school performance as measured by progress reports and parent/teacher feedback.
- Improved language proficiency of participating parents as demonstrated through behaviors associated with engagement at their child's school.

Based on our review of program documentation and discussions with staff, program performance objectives were not met and the agency was not compliance with contractual program objectives. See Finding #1 for more details

4. Reliability of Financial and Programmatic Reporting

The contract requires submission of an annual audit report performed by a Certified Public Accountant. The contract also requires the agency to submit to Metro year end reports of the program outcome and a final expenditures report, no more than 45 days after the close of the contract.

We reviewed all applicable financial and programmatic reports required by the contract, including audited financial statements. Based on our review, the agency complied with all financial and programmatic reporting requirements.

5. Internal Control Environment

In order to determine the adequacy of the design of internal controls, we obtained and reviewed an independent auditor's report on internal control over financial reporting and/or a completed internal control questionnaire. This audit procedure was performed solely as a basis for determining our test work and to assist us in making suggestions for improvement to management. We did not evaluate the operating effectiveness of internal controls over financial reporting.

Our review of the design of the agency's internal controls did not reveal any control deficiencies. Further, nothing came to our attention that would necessitate suggestions for improvement in internal control activities to management.

RESULTS OF REVIEW

6. Civil Rights Requirements

Our review did not reveal anything to indicate that the agency was noncompliant with civil rights requirements. The agency also has necessary written policies and procedures relating to civil rights. The agency has not received any complaints regarding any form of discrimination. Further, civil rights and ADA postings are publicly displayed.

FINDINGS AND RECOMMENDATIONS

1. Program Performance Goal Not Met

Finding

The Urban League of Middle TN failed to report on 2 of 3 program objectives and it also failed to meet the stated outcome of the third objective in the contract. :

The agency failed to report on two (2) program outcomes as required by the grant contract. The agency was required to provide and report on the following program outcomes:

- 1) Demonstrated improvements in overall school performance as measured by progress reports and parent/teacher feedback.
- 2) Improved language proficiency of participating parents as demonstrated through behaviors associated with engagement at their child's school.

Per section D.9 Reporting requirement under the Standard Terms and Conditions of the grant contract, the recipient "shall submit a final program report within 45 (forty-five) days of the end of the Grant Contract. Said reports shall detail the outcomes of the activities funded under this Grant Contract"

Also, the agency failed to meet the expected outcome of the third objective:

- 1) The ELD (English Language Development) sessions for parents will become general parent training, serving up to 20 adult family members.

Based on our review of program documentation, OFA determined that the agency only provided general parent training to 15 adults and not the 20 as required by the grant contract; therefore it failed to meet this objective of the contract.

Recommendation:

The agency should ensure that program results, for the required program objectives, are included annual program report. In addition, information pertaining to program objectives in the Final Program Report should be based on actual results and supported by written documentation. Management should review the achievement of those objectives before they are reported to the Metro Office of

RESULTS OF REVIEW

Grants Coordination in order to ensure accuracy and to make sure the objectives are reasonable and obtainable.

Corrective Action Plan Required

Please submit a corrective action plan indicating the actions the agency intends to take to correct the findings identified in this report. The corrective action plan should be submitted within 30 days from the report date to the address below:

Division of Grants Coordination
PO Box 196300
Nashville, TN 37219
ATTN: Dennise Meyers